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November 7, 2002

Mr. Mark Howard

Reregistration Branch, SRRD (H7508W)

U.S. Environmental Protection Agency

Ariel Rios Building

1200 Pennsylvania Ave., N.W.

Washington, DC 20460

RE: 4-CPA

Mini-SMART Meeting October 24, 2002

Dear Mr. Howard:

The following comments respond to the various questions from EPA reviewers during the

meeting cited above:

- 1) Based on usage during the past several years, estimated future use of 4-CPA to inhibit root development of sprouting mung beans will be less than 20 pounds per year.
- 2) Both LaChoy and Chun King bean sprouts are now produced at the Archibald, Ohio facility using the same procedure.
- 3) This facility produces canned bean sprouts only. No sprouts for the fresh market are grown with this procedure.
- 4) Currently, there are only three laboratory employees who are exposed to 4-CPA during measuring, mixing and use. No change is expected in the future.
- 5) Depending on the temperatures of incoming water, it takes five to six days total to grow the bean sprouts. The beans are first soaked for five to eight hours in the solution of 4-CPA. Then, the beans are rinsed with water, placed in the growing bins, in growth chambers and irrigated (sprayed) every 70 minutes. After about five days, the bins are flooded with water to float the beans and sprouts to the packing area. Immediately edible sprouts are separated from non-edible other plant parts and canned. If you desire more detail, please review the information provided to the Case Manager several years ago.
- 6) ConAgra does not have consumption data that is different from figures used by EPA several years ago.
- 7) As expressed during our meeting, the lower residue tolerance of 0.2 ppm should be used in any dietary exposure calculations, rather than the previously published tolerance of 2.0 ppm.
- 8) Since EPA's evaluation several years ago, there has been no change in the

way rinse and wastewater are being handled. Water goes directly to the POTW. (Publicly Owned Treatment Works) Any residual water on the unused bean hulls goes to the local landfill.

9) Likewise, there has been no change in the way solid waste is being treated. Solids are separated mechanically from any associated liquids and sent to the local landfill.

10) Information on the residue levels detected and the breakdown of 4-CPA is in EPA's files and referred to in the previous RED. The studies were run in 1995. Nothing has changed to our knowledge. Please contact me if these data need to be resubmitted.

Please contact me if other information is desired at this time.

Sincerely,

Richard J. Otten

Regulatory Consultant for ConAgra Foods

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